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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRIDIS CRUZ-REYES,

Defendant.

Case No.: 24-CR-381-JSC

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE HEARING**

Mr. Cruz-Reyes is set for a status hearing before this Court on December 4, 2024 at 10:00 a.m. The parties have been discussing an appropriate disposition of the case and need more time. The parties thus stipulate and request that the Court re-set this matter for December 18, 2024 at 10:00 a.m.

Thus, the parties stipulate to the following:

- 1) The defendant excludes time of all applicable time periods under the Speedy Trial Act from December 4, 2024, through December 18, 2024.
- 2) The parties further agree that time should be excluded in order to provide reasonable

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time necessary for effective preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

- 3) The parties further stipulate and agree that the ends of justice served by excluding the time from December 4, 2024 through December 18, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

Counsel for Mr. Cruz-Reyes certify that they obtained approval from government counsel to file this stipulation and proposed order.

SO STIPULATED.

DATED: December 3, 2024

ISMAIL RAMSEY

United States Attorney

/s/

JOSIAH BOURNES

Assistant United States Attorney

/s/

SHAFFY MOEEL

MOEEL LAH FAKHOURY LLP

Attorneys for Mr. Cruz-Reyes

~~[PROPOSED]~~ ORDER

Accordingly, and for good cause shown, THE COURT ORDERS THAT:

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court orders that Mr. Cruz-Reyes's status hearing be re-set to December 18, 2024 at 10:00 a.m.


The Court further finds good cause to exclude all applicable time periods under the Speedy Trial Act from December 4, 2024, through December 18, 2024.

The Court further finds that failure to exclude time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

Thus, the Court finds that the ends of justice served by excluding the time from December 4, 2024 through December 18, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

Dated: December 3, 2024


HON. JACQUELINE S. CORLEY
UNITED STATES DISTRICT JUDGE